

### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 7

11201 Renner Boulevard Lenexa, Kansas 66219

NOV 1 8 2014

Mr. Richard Bondy Emergency Response and Preparedness Coordinator Magellan Midstream Holdings GP, LLC One Williams Center, MD 27-2 Tulsa, Oklahoma 74172

Re: Magellan St. Joseph Terminal

Wathena, Kansas FRP07A023

Dear Mr. Bondy:

On July 21, 2014, the above-referenced facility was inspected under the authority of Section 308 of the Clean Water Act, 33 U.S.C. § 1318 and in accordance with the Facility Response Plan (FRP) requirements of 40 CFR Part 112.

The inspection determined that the FRP's assessment of the facility's small, medium, and worst-case discharge scenarios is accurate and appropriate. Terminal personnel demonstrated proper training and knowledge of emergency actions to be taken in the event of a release. A review of the facility's tactical response strategies determined that the facility's planned response actions are appropriate, implementable and can be effective in controlling a release until additional response resources are mobilized. Facility training, exercise, and inspection documentation was reviewed and found to be well maintained and complete.

A copy of our FRP Inspection Checklist is enclosed for your information.

In conjunction with the inspection, a review of the FRP was conducted and after suggested changes were made and received via the e-mail dated September 4, 2014, no deficiencies were noted. It is our determination that the St. Joseph Terminal is currently in full compliance with the applicable Facility Response Planning statutes and regulations. If it is subsequently determined that violations exist, EPA reserves all rights it may have to take appropriate enforcement action.

If there are any questions regarding the above, please contact me at (913) 551-7488 or by email at nold.eric@epa.gov.

Thank you for your cooperation in this matter.

Eric Nold

Sincerely

On-Scene Coordinator

Planning and Preparedness South Section

Emergency Response South Branch

Superfund Division

Printed on Recycled Paper

### Facility Response Plan Plan Review Checklist

For Verifying Compliance with Facility Response Plan Requirements

Activity Inform	mation
Activity Type	FRP Plan Review
Reason for Review	☐ Initial Plan Submittal (new FRP)  ☑ 5-year Review ☐ Plan Amendment (note type) ☐ Other (note other reason) Note:
Activity Date	
EPA Inspector	

112.20(h)(11)	A. Response Plan Cover Sheet (sec. 2.0)	YES	NO	N/A
	General Information (sec 2.1)			-
	Facility name	V		
	Facility address	V		
	Facility telephone number	V		
	Mailing address (if different from facility address)	V		
	Facility owner/operator and address(recommended)	V		
	Facility owner telephone(recommended)	V		
	Dun & Bradstreet number	V		
	Longitude (degrees, minutes, seconds)	V		
	Latitude (degree, minutes, seconds)	V		
	North American Industrial Classification System (NAICS) code	V		
	Facility start up date(recommended)			V
	Facility acres (recommended)			V
	Name of protected waterway or environmentally sensitive area			V
	Distance to navigable water	V		
	Worst case discharge amount (gallons)	V		
	Maximum oil storage capacity (gallons)	V		
	Largest aboveground storage tank (AST) capacity (gallons)	V		
	Total number of ASTs	V		
	Total number of underground storage tanks (USTs)	V		
	Total UST storage	V		
	Total storage of drums and transformers that contain oil			V
	Number of surface impoundments and total storage of surface	V		

	Applicability of Substantial Harm Criteria (sec.2.2)			
	Attachment C-1 with answer to each applicability question	7		
	Documentation of reliability and analytical soundness of alternate formula			V
Please use the follo	wing space to note any missing or incomplete information.			
	Certification (sec. 2.3)			
	Plan holder certification is included (contains signature, title, and date)	V		
Please use the follo	wing space to note any missing or incomplete information.			
	Verification of Contract (sec. 2.4)			
	Plan holder certification is included (contains signature, title, and date)			<b>V</b>
Please use the follo	wing space to note any missing or incomplete information.			
			-	
112 20/h\/1\	D. C	I VES	I NO	Ι ΝΙ/Δ
112,20(h)(1)	B. Emergency Response Action Plan (ERAP) (sec. 1.1)	YES	NO	N/A
112.20(h)(1) 112.20(h)(1)	B. Emergency Response Action Plan (ERAP) (sec. 1.1)  Separate Section of FRP	YES	NO	N/A
112.20(h)(1)	Separate Section of FRP	V		
112.20(h)(1) 112,20(h)(1)(i), 112,20(h)(1)(ii),	Separate Section of FRP  Qualified Individual (QI) Information (sec. 1.2)	V V		
112.20(h)(1) 112,20(h)(1)(i), 112,20(h)(1)(ii), 112.20(h)(3)(iii)	Separate Section of FRP  Qualified Individual (QI) Information (sec. 1.2)  Emergency Notification List (sec. 1.3.1)	y y		
112.20(h)(1) 112,20(h)(1)(i), 112,20(h)(1)(ii), 112.20(h)(3)(iii)	Separate Section of FRP  Qualified Individual (QI) Information (sec. 1.2)  Emergency Notification List (sec. 1.3.1)  Spill Response Notification Form (sec. 1.3.1)			
112.20(h)(1) 112,20(h)(1)(i), 112,20(h)(1)(ii), 112.20(h)(3)(iii) 112.20(h)(1)(iv) 112.20(h)(1)(iv)	Separate Section of FRP  Qualified Individual (QI) Information (sec. 1.2)  Emergency Notification List (sec. 1.3.1)  Spill Response Notification Form (sec. 1.3.1)  Response Equipment List and Location (sec. 1.3.2)	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \		
112.20(h)(1) 112,20(h)(1)(ii), 112,20(h)(3)(iii) 112.20(h)(3)(iv) 112.20(h)(1)(iv) 112.20(h)(1)(v)	Separate Section of FRP  Qualified Individual (QI) Information (sec. 1.2)  Emergency Notification List (sec. 1.3.1)  Spill Response Notification Form (sec. 1.3.1)  Response Equipment List and Location (sec. 1.3.2)  Response Equipment Testing and Deployment (sec. 1.3.4)	N		
112.20(h)(1) 112,20(h)(1)(ii), 112,20(h)(1)(ii), 112.20(h)(3)(iii) 112.20(h)(1)(iv) 112.20(h)(1)(iv) 112.20(h)(1)(v) 112.20(h)(1)(vi)	Separate Section of FRP  Qualified Individual (QI) Information (sec. 1.2)  Emergency Notification List (sec. 1.3.1)  Spill Response Notification Form (sec. 1.3.1)  Response Equipment List and Location (sec. 1.3.2)  Response Equipment Testing and Deployment (sec. 1.3.4)  Facility Response Team List (sec. 1.3.4)	S		
112.20(h)(1) 112,20(h)(1)(ii), 112,20(h)(1)(ii), 112.20(h)(3)(iii)  112.20(h)(1)(iv) 112.20(h)(1)(iv) 112.20(h)(1)(v) 112.20(h)(1)(vi) 112.20(h)(1)(vii)	Separate Section of FRP  Qualified Individual (QI) Information (sec. 1.2)  Emergency Notification List (sec. 1.3.1)  Spill Response Notification Form (sec. 1.3.1)  Response Equipment List and Location (sec. 1.3.2)  Response Equipment Testing and Deployment (sec. 1.3.4)  Facility Response Team List (sec. 1.3.4)  Evacuation Plan (sec. 1.3.5)	N		
112.20(h)(1) 112,20(h)(1)(i), 112,20(h)(1)(ii), 112.20(h)(3)(iii) 112.20(h)(1)(iv) 112.20(h)(1)(iv) 112.20(h)(1)(v) 112.20(h)(1)(vi)	Separate Section of FRP  Qualified Individual (QI) Information (sec. 1.2)  Emergency Notification List (sec. 1.3.1)  Spill Response Notification Form (sec. 1.3.1)  Response Equipment List and Location (sec. 1.3.2)  Response Equipment Testing and Deployment (sec. 1.3.4)  Facility Response Team List (sec. 1.3.4)  Evacuation Plan (sec. 1.3.5)  Immediate Actions (sec. 1.7.1)	N		

112.20(h)(2)	C. Facility Information (sec. 1.2)	YES	NO	N/A		
	Facility name (sec. 1.2.1)	7	Ш			
	Street address	V				
	City, state, zip code	V				
	County	V				
	Phone number	V				
	Latitude/longitude (sec. 1.2.2)	V				
	Wellhead protection area (sec. 1.2.3)	V				
	Owner/operator (both names included, if different) (sec. 1.2.4)	7				
	QI Information (sec. 1.2.5)	V				
	-Name, position, street address, phone numbers	V				
	- Description of specific response training experience	7				
	Oil storage start-up date (sec. 1.2.6)	N				
	Facility operations description (sec. 1.2.7)	V				
1	North American Industrial Classification System (NAICS) or Standard Industrial Classification code (SIC)	V				
	Dates and types of substantial expansion (sec. 1.2.8)			V		
Please use the following space to note any missing or incomplete information in Section 1.2 of the Plan and, to the exten possible, assess the accuracy of the information provided based on field inspection.						

112.20(h)(1) and (3)	D. Emergency Response Information (sec. 1.3)	YES	NO	N/A
	Notification (sec. 1.3.1)			
	Emergency Notification Phone List	<b>V</b>		
	National Response Center phone number	7		
112.20(h)(1)(i)	QI (day and evening) phone numbers	V		
	Company response team (day and evening) phone numbers	<b>V</b>		
	Federal On-Scene Coordinator (OSC) and/or Regional Response Center (day and evening) phone numbers	V		
	Local response team phone numbers (fire department/cooperatives)	V		
	Fire marshal (day and evening) phone numbers	V		
	State emergency response phone number(s)	V		
	State Police phone number	~		
	State Emergency Response Commission (SERC) phone number	7		
	Local emergency planning committee (LEPC) phone number	V		
	Wastewater treatment facility(s) name and phone number (ecommended)			V
	Local water supply system (day and evening) phone numbers	V		

	Weather report phone number	v		
	Local television/radio phone number(s) for evacuation notification	V		
112.20(h)(3)(i)	Spill response contractor(s)	V		
	Factories/Utilities with water intakes (ecommended)	V		
	Trustees of sensitive areas (recommended)	V		
	Hospital phone number	V		
	Spill Response Notification Form			
	Reporter's name, position and phone number	V		
	Company information	V		
	Incident description (source/cause)	V		
-	Material (were materials discharged?)	V		
	Response action (meeting federal obligations to report, calling for responsible party, time called)	V		
	Impact			
	Date/time of incident, incident address/location, nearest city/state/county/zip code, distance from city/units of measure/direction from city, township, range, borough, container type/tank oil storage capacity	V		
	Units of measure, facility oil storage capacity/units of measure, facility longitude and latitude	V		
	llowing space to note any missing or incomplete information in Section 1.3 of acy of the information provided based on field inspection.  Response Equipment (sec 1.3.2)	the Plan	. Please	e use to
112.20(h)(3)(vi)				
2:	Equipment Information			
	Equipment list	V		
	Equipment location	v		
	Release handling capabilities and limitations (e.g., launching sites)	V		
Please use the fo	llowing space to note any missing or incomplete information.			

112.20(h)(3)(vi)	E. Response Equipment List ( Identify if Facility, OSRO, CO-OP owned by letters O, F, or C) (sec. 1.3.2)	YES	NO	N/A
0	Skimmers/pumps (operational status, type/model/year, number or quantity capacity, daily effective recovery rate, storage location)	V		
F	Boom (containment boom: operational status, year, number, skirt size)	V		
F	Boom (sorbent boom: operational status, type/model/year, number, size (length))	7		
	Chemical countermeasure agents stored			V
F	Sorbents (type, year purchased, amount, storage location)	V		
F	Hand tools (type, quantity, storage location)	V		
	Communications equipment (operational status, type and year, quantity, storage location)	V		
	Fire Fighting and Personnel Protective Equipment	V		
	Boats and Motors (operational status, type, and year, quantity, storage location)			Ø
F	Other (e.g., heavy equipment, cranes, dozers, etc.) (operational status, type and year, quantity, storage location)	V		
F	Equipment Location	V		
-	Amount of oil that emergency response equipment can handle and limitations (e.g., launching sites) must be described.	V		
was on site and w	The second secon	YES	NO	N/A
(ii)	Log (sec. 1.3.3)			
	Date of last inspection or equipment test	V		
	Inspection Frequency	V		
	Date of Last Deployment	V		
-	Deployment Frequency	V		
	OSRO Certification (Note: Facilities without facility owned response equipment must ensure that the Oil Spill Removal Organization that is identified in the response plan to provide this response equipment certifies that the deployment exercises have been met)			
	ollowing space to note any missing or incomplete information in Section 1.3.3 on is up-to-date during the field inspection.	of the Pla	an and v	erify that

	G. Personnel (sec. 1.3.4)	YES	NO	N/A		
112.20(h)(3)(v), 112.20(h)(1)(v)	Emergency Response Personnel Information(Personnel whose duties involve responding to emergencies, including oil discharges, even when they are not present at the site)					
	Response personnel name(s)	7				
	Facility response team title/position	\				
	Response personnel phone numbers (work/home, other)	\				
	Response personnel response time	V				
	Response personnel responsibility	<b>V</b>				
	Response personnel training (type and date)	V				
112.20(h)(3)(i)	Emergency Response Contractor Information					
	Response contractor name (s)	7				
	Response contractor phone numbers	7				
	Response contractor response time	V				
112.20(h)(3)(ii)	Response contractor evidence of contractual arrangements	<b>V</b>				
	Facility Response Team Information(Composed of Emergency Response Personnel and Emergency Response that will respond immediately)					
	Response team member name(s)	V				
	Response team member job function	V				
	Response team member response time	7				
	Response team member phone/pager number	<b>V</b>				
	Name of emergency response contractor (contractors providing facility response team services may be different than contractors providing oil spil response services)			V		
	- Response time	V				
	- Phone/pager	V				
	llowing space to note any missing or incomplete information in Section 1.3.4 connot be 0 hours from St. Paul, MN. Also, ACME can't get from Tulsa, OK					

112.20(h)(1)(vi), 112.20(h)(3)(vii)	H. Evacuation Plans (sec. 1.3.5)	YES	NO	N/A
	Facility Evacuation Plan (sec. 1.3.5.1)			
	Location of stored materials	V		
	Hazard imposed by spilled materials	V		
	Spill flow direction	V		
	Prevailing wind directions and speed	V		
	Water currents, tides, or wave conditions (if applicable)	V		
	Arrival route of emergency response personnel and response equipment	V		
	Evacuation routes	V	Image: Control of the	
	Alternative routes of evacuation		V	

	Transportation of injured personnel to nearest emergency medical facility	<b>V</b>		
	Location of alarm/notification systems		Ø.	
	Centralized check-in area for roll call	7		
	Mitigation command center location	V		
	Location of shelter at facility	V		
112.20(h)(3)(vii), 112.20(h)(1)(vi)	Community Evacuation Plans referenced (sec. 1.3.5.3)	V		
the accuracy of the	lowing space to note any missing or incomplete information in Section 1.3.5 or e information provided based on field inspectionAn alternative evacuation reconsidered in case the front gate can't be used. Location of air horn n	oute to t	he rear	of the
112.20(h)(3)(ix)	I. Qualified Individual's Duties (sec. 1.3.6)	YES	NO	N/A
112.20(h)(3)(ix)(A)	Activate internal alarms and hazard communication systems	7		
112.20(h)(3)(ix)(B)	Notify Response Personnel	V		
112.20(h)(3)(ix)(C)	Identify character, exact source, amount, and extent of the release	v		
112.20(h)(3)(ix)(D)	Notify and provide information to appropriate Federal, State and local authorities	Ø		
112.20(h)(3)(ix)(E)	Assess interaction of spilled substance with water and/or other substance stored at facility and notify on-scene response personnel of assessment	V		
112.20(h)(3)(ix)(F)	Assess possible hazards to human health and the environment	V		
112.20(h)(3)(ix)(G)	Assess and implement prompt removal actions	V		
112.20(h)(3)(ix)(H)	Coordinate rescue and response actions	v		
112.20(h)(3)(ix)(l)	Access company funding to initiate cleanup activities	V		
112.20(h)(3)(ix)(J)	Direct cleanup activities	V		
Please use the fo	llowing space to note any missing or incomplete information.			
112.20(h)(4)	J. Hazard Evaluation (sec. 1.4) (See Section II, Appendix A)	YES	NO	N/A
100	Hazard Identification (sec. 1.4.1)			
	Tank Above Ground and Below Ground			
	Tanks (List Tanks by Number, Product and Shell Capacity in the space be	elow)	5-20	
	Tank number(s)	V		
	Substance(s) stored	V		
	Quantity(s) stored	V		
	Tank type(s)/year(s) of construction	<b>V</b>		
	Shell capacity(s)	V		
	Failure(s)/cause(s)	V		

	SI Number(s) Substance(s) Stored			
	Substance(s) Stored			V
				V
	Quantity(s) Stored			V
	Surface area(s)/year(s) of construction			V
	Maximum capacity(s)			V
	Failure(s)/cause(s)			V
	Labeled schematic drawing			V
	Description of transfers (loading and unloading) and volume of material			V
	Description of daily operations			V
	Secondary containment volume(s)			V
	Normal daily throughput of the facility			V
12.20(h)(4)	K. Vulnerability Analysis (sec. 1.4.2)(See Appendix A - Calculation of the Planning Distance)	YES	NO	N/A
	part provides a method that owners or operators shall use to determine ap the facility to fish and wildlife and sensitive environments. Owners or opera formula that is considered acceptable by the Regional Administrator (RA).	tors can u	use a co	mparab
		tors can u	use a co parable	es from mparabl formula
	the facility to fish and wildlife and sensitive environments. Owners or opera formula that is considered acceptable by the Regional Administrator (RA). used, documentation of the reliability and analytical soundness of the form	tors can u	use a co parable	es from mparab formula
	the facility to fish and wildlife and sensitive environments. Owners or opera formula that is considered acceptable by the Regional Administrator (RA). used, documentation of the reliability and analytical soundness of the form Response Plan Cover Sheet.)	tors can under the tors can under the tors to the tors	use a co parable be attac	es from mparab formula ched to
	the facility to fish and wildlife and sensitive environments. Owners or opera formula that is considered acceptable by the Regional Administrator (RA). used, documentation of the reliability and analytical soundness of the form Response Plan Cover Sheet.)  Water intakes (drinking, cooling or other)	If a com ula must	use a co parable be attac	es from mparab formula ched to
	the facility to fish and wildlife and sensitive environments. Owners or opera formula that is considered acceptable by the Regional Administrator (RA). used, documentation of the reliability and analytical soundness of the form Response Plan Cover Sheet.)  Water intakes (drinking, cooling or other)  Schools	tors can u If a com nula must	use a co parable be attac	es from mparab formula ched to
	the facility to fish and wildlife and sensitive environments. Owners or opera formula that is considered acceptable by the Regional Administrator (RA). used, documentation of the reliability and analytical soundness of the form Response Plan Cover Sheet.)  Water intakes (drinking, cooling or other)  Schools  Medical facilities	If a compula must	use a coparable be attac	es from mparab formula ched to
	the facility to fish and wildlife and sensitive environments. Owners or opera formula that is considered acceptable by the Regional Administrator (RA). used, documentation of the reliability and analytical soundness of the form Response Plan Cover Sheet.)  Water intakes (drinking, cooling or other)  Schools  Medical facilities  Residential areas	If a compular must	Jse a coparable be attace	es from mparab formula ched to
	the facility to fish and wildlife and sensitive environments. Owners or opera formula that is considered acceptable by the Regional Administrator (RA). used, documentation of the reliability and analytical soundness of the form Response Plan Cover Sheet.)  Water intakes (drinking, cooling or other)  Schools  Medical facilities  Residential areas  Businesses	tors can u If a com nula must	use a coparable be attace	es from mparab formula ched to
	the facility to fish and wildlife and sensitive environments. Owners or opera formula that is considered acceptable by the Regional Administrator (RA). used, documentation of the reliability and analytical soundness of the form Response Plan Cover Sheet.)  Water intakes (drinking, cooling or other)  Schools  Medical facilities  Residential areas  Businesses  Wetlands or other sensitive environments	tors can u If a com nula must	Jse a coparable be attack	es from mparab formula ched to
	the facility to fish and wildlife and sensitive environments. Owners or opera formula that is considered acceptable by the Regional Administrator (RA). used, documentation of the reliability and analytical soundness of the form Response Plan Cover Sheet.)  Water intakes (drinking, cooling or other)  Schools  Medical facilities  Residential areas  Businesses  Wetlands or other sensitive environments  Fish and wildlife	If a commula must	use a coparable be attack	es from mparab formula ched to
	the facility to fish and wildlife and sensitive environments. Owners or opera formula that is considered acceptable by the Regional Administrator (RA). used, documentation of the reliability and analytical soundness of the form Response Plan Cover Sheet.)  Water intakes (drinking, cooling or other)  Schools  Medical facilities  Residential areas  Businesses  Wetlands or other sensitive environments  Fish and wildlife  Lakes and streams	tors can u If a com nula must	Jse a coparable be attack	es from mparab formula ched to
	the facility to fish and wildlife and sensitive environments. Owners or opera formula that is considered acceptable by the Regional Administrator (RA). used, documentation of the reliability and analytical soundness of the form Response Plan Cover Sheet.)  Water intakes (drinking, cooling or other)  Schools  Medical facilities  Residential areas  Businesses  Wetlands or other sensitive environments  Fish and wildlife  Lakes and streams  Endangered flora and fauna	tors can u If a com nula must	use a coparable be attace	es from mparab formula ched to
	the facility to fish and wildlife and sensitive environments. Owners or opera formula that is considered acceptable by the Regional Administrator (RA). used, documentation of the reliability and analytical soundness of the form Response Plan Cover Sheet.)  Water intakes (drinking, cooling or other)  Schools  Medical facilities  Residential areas  Businesses  Wetlands or other sensitive environments  Fish and wildlife  Lakes and streams  Endangered flora and fauna  Recreational areas	tors can u If a com nula must	Jse a coparable be attacked be attacked be attacked be attacked be attacked by the beautiful beautiful by the beautiful beauti	es from mparab formula ched to

112.20(h)(4)	L. Analysis of the Potential for an Oil Spill (sec. 1.4.3)	YES	NO	N/A
	Description of likelihood of release occurring	V		
	Oil spill history for the life of the facility	V		
	Horizontal range of potential spill	V		
	Vulnerability to natural disaster	V		
	Tank age	V		
	Other factors (e.g., unstable soils, earthquake zones, Karst topography, etc.)			V
	ollowing space to note any missing or incomplete information in Section 1.4.3 on the information based on field inspection.	of the Pla	in and to	assess

112.20(h)(4)	M. Facility Reportable Oil Spill History Description (sec. 1.4.4)	YES	NO	N/A
	Date of discharge(s)	V		
	List of discharge causes	V		
	Material(s) discharged	V		
	Amount of discharges (gallons)	7		
	Amount that reached navigable waters (if applicable)	7		
	Effectiveness and capacity of secondary containment	7		
	Clean-up actions taken	7		
	Steps taken to reduce possibility of reccurrence	V		
	Total oil storage capacity of tank(s) or impoundment(s) from which material discharged	V		
	Enforcement actions	V		
	Effectiveness of monitoring equipment	V		
	Description(s) of how each oil discharge was detected	V		

Please use the following space to note any missing or incomplete information in Sectio 1.4.4 of the Plan.

Mentions a spill in 2007 but it is claimed that there were no reportable spills and therefore none of the criteria apply - please explain.

N. Discharge Scenarios (sec. 1.5)		YES	NO	N/A
Small Discharges (sec. 1.5.1)(Description of small discharges add components including but not limited to (see. 1.5.1.1):	ressing	facility	operation	ns and
Loading and unloading operations	200	V		
Facility maintenance operation		V		
Facility piping		V		
Pumping stations and sumps		V		
Oil storage location		V		
Vehicle refueling operations				V
Age and condition of facility components		V		
Small volume discharge calculation for a facility	,	V		
Facility-specific spill potential analysis		V		
Average most probable discharge for complexes				V
1,000 feet of boom (1 hour deployment time)		V		
Correct amount of boom for complexes			. 🗆	V
Oil recovery devices equal to small discharge (2 hour recovery time	)	V		
Oil storage capacity for recovered material		V		
Scenarios Affected by the Response Efforts (sec. 1.5.1.2)	*			
Size of the discharge		V		
Proximity to downgradient wells, waterways, and drinking water inta	akes	V		
Proximity to fish and wildlife and sensitive environments		v		
Likelihood that the discharge will travel offsite (i.e., topography, dra	inage)	V		
Location of the material discharged (i.e., on a concrete pad or direct the soil)	tly on	Ø		
Material discharged		V		
Weather or aquatic conditions (i.e., river flow)		V		
Available remediation equipment	-	V		
Probability of a chain reaction of failures		V		
Direction of discharge pathway		V		
Medium Discharges (sec. 1.5.1)(Description of medium discharge operations and components including but not limited to (sec. 1.5.1.		arios ad	dressing	facility
Loading and unloading operations		V	Τ□	
Facility maintenance operation		V		
Facility piping		v		
Pumping stations and sumps		V		
Oil storage location		v		
Vehicle refueling operations				V
Age and condition of facility components		v		

Medium volume discharge calculation for a facility	V		
 Facility-specific spill potential analysis	V		
Maximum most probably discharge for complexes			V
 Oil recovery devices equal to medium discharge	V		
 Availability of sufficient quantity of boom	V		
Oil storage capacity for recovered material	V		
Scenarios Affected by the Response Efforts (sec. 1.5.1.2)			
 Size of the discharge	V		
Proximity to downgradient wells, waterways, and drinking water intakes	V		
Proximity to fish and wildlife and sensitive environments	Ø		
Likelihood that the discharge will travel offsite (i.e., topography, drainage)	V		
Location of the material discharged (i.e., on a concrete pad or directly on the soil)	<b>V</b>		
Material discharged	V		
 Weather or aquatic conditions (i.e., river flow)	V		
Available remediation equipment	V		
Probability of a chain reaction of failures	V		
Direction of discharge pathway	V		
e following space to note any missing or incomplete information in Section 1.5.1 of the information provided based on field inspection.  O. Worst Case Discharge (sec. 1.5.2) (See Appendix A) (When	YES	NO NO	N/A
planning for the worst case discharge response all of the factors listed in the small and medium discharge section of the response plan shall be addressed)			
	_	-	

112.20(h)(5)(i)	O. Worst Case Discharge (sec. 1.5.2) (See Appendix A) (When planning for the worst case discharge response all of the factors listed in the small and medium discharge section of the response plan shall be addressed)	YES	NO	N/A
	Facility Specific Worst Case Discharge Scenario	V		
	Description of worst case discharges scenarios addressing facility of components including but not limited to (sec. 1.5.1.1):	perations	s and	
	Loading and unloading operations			V
	Facility Maintenance Operation			<b>V</b>
	Facility Piping			V
	Pumping stations and sumps			V
	Oil storage location	V		
	Vehicle refueling operations			V
	Age and condition of facility components	V		
112 Appendix D	Correct Worst Case Discharge (WCD) calculation for specific type of facility	V		

112.20(h)(6)		YES	NO	N/A
22 4111 10-17				
	rivers/canals scenerio should have been used. Storage capacity of replan. Revised planning volume calculations submitted and inserted in		materia	al not
the accuracy of the	wing space to note any missing or incomplete information in Section 1.5.2 or information provided based on field inspection. Nearshore/great lakes sce	nerio wa	s used f	for
Diagrama the falls	Direction of discharge pathway	√ Fthe Die	n and to	
	Probability of a chain reaction of failures	V		
	Available remediation equipment	<b>V</b>		
	Weather or aquatic conditions (i.e., river flow)	V		
	Material discharged	7		
	Location of the material discharged (i.e., on a concrete pad or directly on the soil)	V		
	Likelihood that the discharge will travel offsite (i.e., topography, drainage)	V		
	Proximity to fish and wildlife and sensitive environments	V		
	Proximity to downgradient wells, waterways, and drinking water intakes	V		
	Size of the discharge	V		
	Scenarios Affected by the Response Efforts (sec. 1.5.1.2)			
	Oil storage capacity for recovered material		V	
	Sources and quantity of equipment for response to WCD	V		
112 Appendix E	Sufficient response resources for WCD		V	
	Correct WCD calculation for complexes			V

112.20(h)(6)	P. Discharge Detection Systems (sec. 1.6)	YES	NO	N/A
	Discharge Detection by Personnel (sec. 1.6.1)			
	Description of procedures and personnel for spill detection	V		
	Description of facility inspections	V		
	Description of initial response actions	V		
	Emergency Response Information (referenced)	V		
Please use the	following space to note any missing or incomplete information in Section 1.6.1	of the pla	n.	

Section II, 112.7(e)(5)(iii)(D), 112.7(e)(5(iii), 112.7(e)(2)(viii), 112.7(e)(7)(v), Appendix A	Automated Discharge Detection (sec. 1.6.2)			
	Description of automatic spill detection equipment, including overfill alarms and secondary containment sensors	7		
	Description of alarm verification procedures and subsequent actions	V		
	Initial response actions	7		
Please use the fol	llowing space to note any missing or incomplete information in Section 1.6.2 of	of the Pla	n.	5-12
112.20(h)(7), Appendix E	Q. Plan Implementation (sec. 1.7)	YES	NO	N/A
	Identification of response resources for small, medium, and worst car	se spills	(sec. 1.	7.1)
	Description of response actions			
	Accessibility of proper response personnel and equipment	V		
	Emergency plans for spill response	V		
	Additional response training	V		
	Additional contracted help	V		
	Access to additional response equipment/experts	V		
	Ability to implement plan, including response training and practice drifts	V		
	Temporary storage	V		
	Recommended form detailing immediate action for small, medium and Worst Case spills (sec. 1.7.1.2A) (stop the product flow, warn personnel, shut off ignition sources, initiate containment, notify NRC, notify OSC, notify (as appropriate))	V		
Please use the fo	ollowing space to note any missing or incomplete information in Section 1.7.1	of the Pla	an.	
	Disposal Plan (sec. 1.7.2)			
	Description of procedures for recovering, reusing, decontaminating or disposing of materials	7		
% %	Materials addressed in Disposal Plan (recovered product, contaminated soil, contaminated equipment and materials (including drums tank parts, valves and shovels), personnel protective equipment, decontamination solutions, absorbents, spent chemicals))	7		
	Plan prepared in accordance with any federal, state, and/or local regulations	V		

	Plan addresses permits required to transport or dispose of recovered materials	7		
Please use the	following space to note any missing or incomplete information in Section 1.7.2 o	of the Pla	n.	
Section II, 112.7(e)(1), 112.7(e)(7), Appendix A	Containment and Drainage Planning (sec. 1.7.3)			
	Description of containing/controlling a spill through drainage			
	Containment and drainage plan available	V		
	Available volume of containment	V		
	Drainage route from oil storage and transfer areas	V		
	Construction materials used in drainage troughs			V
	Type and number of valves and separators in drainage system			v
	Sump pump capacities			V
	Containment capacities of weirs and booms and their location			v
	Other cleanup materials	V		
	following space to note any missing and incomplete information in Section 1.7.3 fthe information provided during field inspection.	3 of the F	Plan and	to assess

	R. Self-Inspection, Training, and Meeting Logs (sec. 1.8)	YES	NO	N/A
	Facility Self-Inspection (sec. 1.8.1)			
Section II, 112.7(e)(8)	Records of tank inspections with dates (tank leaks, tank foundations, tank Piping) contained or cross-referenced in Plan or maintained electronically for five years	V		
Section II, 112.7(e)(8)	Records of secondary containment inspections with dates (dike or berm system, secondary containment, retention and drainage ponds) contained or cross-referenced in Plan or maintained electronically for five years	V		
112.20(h)(8)(i)	Response equipment inspection	- 275-20		
	Response equipment checklist (sec. 1.8.1.2)	7		
	Equipment inventory (item and quantity)	<b>V</b>		
	Storage location (time to access and respond)	7		
	Accessibility (time to access and respond)	7		
	Operational status/condition	V		
	Actual use/testing (last test date and frequency of testing)	V		
	Shelf life (present age, expected replacement date)	V		
	- Inspection date	V		
	- Inspector's signature	V		
	- Inspection records maintained for 5 years	V		

- Response equipment inspection log (inspector, date, comments)	V		
Please use the following space to note any missing or incomplete information in Section 1.8 of accuracy of the information.	the Plan	and to a	ssess th
Facility Drills/Exercises (sec. 1.8.2)			<u> </u>
Description of drill/exercise program based on National Preparedness for Response Exercise Program (PREP) guidelines or other comparable program	J		
If "no" alternative program has been approved by EPA RA (describe program below)			V
QI notification drill	V		
Spill management team tabletop exercise	V		
Equipment deployment exercise	V		
Unannounced exercise			
Area exercise	V		
Description of evaluation procedures for drill program	V		
Qualified Individual notification drill log (sec. 1.8.2.1)			
Date, company, qualified individual, other contacted, emergency scenario, evaluation	V		
Spill management team tabletop drill log (sec. 1.8.2.2)			
Date, company, QI, participants, emergency scenario, evaluation, changes to be implemented, time table for implementation	V		
Please use the following space to note any missing or incomplete information in Section 1.8.2 the accuracy of the information provided based on field inspection.	of the Pla	in and to	assess
Response Training (sec. 1.8.3)			
Description of response training program (including topics)	V		
Personnel response training logs (name, response training date/and number of hours, prevention training date/and number of hours)	V		
Discharge prevention meeting logs (date, attendees)	V		
Please use the following space to note any missing or incomplete information in Section 1.8.3 the log information is up-to-date during the field inspection.	of the Pla	in and v	erify that

S. Diagrams (sec. 1.9)	YES	NO	N/A
Site Plan Diagram			
Entire facility to scale	V		
Above and below-ground storage tanks	>		
Contents and capacities of bulk oil storage tanks	>		
Contents and capacities of drum storage areas			V
Contents and capacities of surface impoundments			\
Process buildings			
Transfer areas	7		
Location and capacity of secondary containment systems	V		
Location of hazardous materials	V		
Location of communications and emergency response equipment	V		
Location of electrical equipment that might contain oil			7
If the facility is a complex facility, the interface between EPA and other regulating agencies			<b>V</b>
accuracy of the diagram based on field inspection.  Site Drainage Plan Diagram		e e	
Major sanitary and storm sewers, manholes, and drains	V		
Weirs and shut-off valves			
Surface water receiving streams			
Fire fighting water sources			
Other utilities			Image: section of the content of the
Response personnel ingress and egress	<u> </u>		
Response equipment transportation routes			
Direction of spill flow from discharge points	7		
Please use the following space to note any missing or incomplete information in the Site Drains assess the accuracy of the diagram based on field inspection.	age Plan	diagram	and to
Site Evacuation Plan Diagram			
Site plan diagram with evacuation routes	V		
Location of evacuation regrouping areas	V		
Please use the following space to note any missing or incomplete information in the Site Evacudiagram and to assess the accuracy of the diagram based on field inspection.	uation Dr	ainage F	lan

Section II, 112.7(e)(9)	T. Site Security (sec. 1.10)	YES	NO	N/A
	Description of facility security	7		
	(Emergency cut-off locations, enclosures, guards and their duties, lighting, valve and pump locks, pipeline connection caps)			
	following space to note any missing or incomplete information in Section 1.10 o information provided based on field inspection.	f the plar	n and to	assess th
man.				
	following space to describe overall impressions of the facility response plan (i.e		nal, wor	kable). A
set of questions	s is provided in Appendix C to assist the inspector is assessing overall Plan ade	quacy.		
Reviewed by:				
Reviewed by:	Jun Nold for Paul Doherty			
Date:	11/14/14			

### **FRP Planning Distance Calculation Worksheet**

40 CFR 112, Appendix C

The facility must evaluate whether the facility is located at a distance such that a discharge from the facility could cause injury to the environment or a public drinking water intake.

A regulated facility may meet substantial harm criteria without having to perform a planning distance calculation. The planning distance calculation is not necessary for facilities that have inadequate secondary containment or that have experienced a reportable spill in an amount greater than or equal to 10,000 gallons (238 barrels) within the past 5 years.

If more than one type of navigable water condition applies to a facility, then the facility is required to perform a planning distance calculation for each navigable water type to determine the greatest single distance that oil may be transported.

### I. Moving Navigable Water Calculation Not Applicable? Planning Distance (miles) = PD = v \* t \* c (miles) A) \_ Chezy-Manning Equation (ft/s) = $v = (1.5/n) * r^{2/3} * s^{1/2}$ where: n = Manning's Roughness Coefficient (Table 1, 40 CFR 112, Appendix C) 0.035 r = Hydraulic Radius in ft (average mid-channel depth \* 0.667) 6.003 feet s = Average Slope of Moving Waterway (USGS Topo Map) = 9.00E-05 1.343 feet/second t = Time Interval (hours) (Table 3, 40 CFR 112, Appendix C) 27 hours c = Constant Conversion Factor 0.68 sec\*mile hr\*ft Planning Distance 24.66 miles I. Oil Transport on Still Water Not Applicable? Surface Area Covered by an Oil Spill (ft2) = A1 A) $A_1 = 10^5 * V^{3/4} * C$ where: V = Worst Case Discharge Volume (gallons) 2,321,890 gallons C = Constant Conversion Factor 0.1643 $A_1$ 977279512 feet2 Spreading Formula (ft<sup>2</sup>) = A<sub>2</sub> B) $A_2 = (\pi * r^2)/2$ Solving for the radius, r, using $A_1 = A_2$ , then $r = [(2 * A_1)/\pi]^{1/2}$ 24943.04 feet miles C) Total Planning Distance = Spreading Distance + 18.6 miles 23.32 miles

### **Worst Case Discharge Worksheet**

40 CFR 112, Appendix D

I. Si	ingle Tank Facilities	☑	Not Applicable?
	The Tank's Capacity = gallons		
A)	Secondary Containment is Adequate		
	The Worst Case Discharge is 80% of the Tank's Capacity	=	0 gallons
B)	Secondary Containment is not Adequate		
	The Worst Case Discharge is Equal to the Tank's Capacity	=	0 gallons
II. N	Iultiple Tank Facilities		Not Applicable?
A)	All Aboveground Storage Tanks (ASTs) Lack Adequate Secondary Containment		
	The Worst Case Discharge is Equal to the Total Capacity of all ASTs	=	0 gallons
B)	Some or All ASTs Have Adequate Secondary Containment		
	The Total Storage Capacity of ASTs Without Adequate Containment	=	0 gallons
	The Capacity of the Largest AST with Adequate Containment	=	2,321,890 gallons
	The Worst Case Discharge is the Sum of the Above Capacities	=	2321890 gallons
	The Worst Case Discharge Is		2,321,890 gallons
			55,283 barrels

add USCG equivalents add DOT equivalents add small and medium discharge calculations

# Worksheet to Plan Volume of Response Resources for Worst Case Discharge

### 40 CFR 112, Appendix E

	arrels			10 10			0.3
	55,283 barrels			(D1) (D2) (D3)			(G1) (G2) (G3)
	II	11	r "Great Lakes") rivers and canals	Percent Natural Dissipation Percent Recovered Floating Oil Percent Oil Onshore	barrels barrels		n
		and 1.2.9)	"Rivers and Canals" or "Inland/Nearshore" or "Great Lakes")	Percent Natural Diss Percent Recovered F Percent Oil Onshore	5528.31 barrels 5528.31 barrels	_	· (Table 4) Tier 1 Tier 2 Tier 3
	in Barrels	ection 1.2.3, 1.2.8,	Canals" or "Inland/	II	11 11	II	: Mobilization Factor
I. Background Information	(A) = The Worst Case Discharge in Barrels	Oil Group Designation (Section 1.2.3, 1.2.8, and 1.2.9)	Operating Area (input "Rivers and =	Oil Percentages (Table 2)	(E1) = On-Water Oil Recovery (E2) = Shoreline Recovery	(F) = Emulsification Factor	On-Water Oil Recovery Resource Mobilization Factor (Table 4) Tie
I. Backg	¥	B)	Ô	(Q	E)	F)	(S)

5528.31 barrels

II

Tier 3 3316.99

Tier 2 2211.32

Tier 1 1658.49 III. Shoreline Cleanup Volume (barrels)

Shoreline Cleanup Volume

II. On-Water Oil Recovery Capacity (barrels/day)

### IV. On-Water Response Capacity by Operating Area

Current date

5/14/2014

 Tier 3 (J3)	Tier 2 (J2)	Tier 1 (J1)

this is incorrect; should 12,500 bbl/d

## V. On-Water Amount Needed to Be Identified but not Contracted for in Advance (barrels/day)

Tier 1	Tier 2	Tier 3
-216.51	-1538.68	-4183.01

if values are negative, response should "0".